

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>19-13220 ELF</b>
<b>JOHN THOMAS KEENAN</b>	:	
	:	<b>Chapter No. 13</b>
<b>Debtors</b>	:	
	:	

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the undersigned appears for **FREEDOM MORTGAGE CORPORATION** (“the Creditor”), and pursuant to Bankruptcy Rule 2002(g) and 2002(h) and 9007 and §1109(b) of the Bankruptcy Code, with regards to the real property, located at 5177 FOXCROFT DRIVE, SCHNECKSVILLE, PA 18078 with the mortgage recorded on October 6, 2015 Instrument Number 2015029945 demands that all notices that are required to be given in this case and all papers that are required to be served in this case, be given to and served upon the undersigned at the office, post office address and telephone number set forth below.

**PLEASE TAKE FURTHER NOTICE** that pursuant to §1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral whether transmitted or conveyed by mail, delivered, telephone, telegraph, telex or otherwise which affect or seek to affect in any way the Creditor’s rights or interest, with respect to Debtor or the property on which Creditor holds a first mortgage lien.

November 1, 2019

/s/ Robert J. Davidow, Esquire  
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